

EPA Region 5 Records Ctr.



314066

February 5, 2008

Mr. Ken Leanin
Michigan Department of Environmental Quality
Water Bureau - Kalamazoo District Office
7953 Adobe Road
Kalamazoo, MI 49009-5026

RE: Allied Paper No. 7 SF-Plainwell
MIU990026 Substantive Requirement Document Upset Non-Compliance Notification

Dear Mr. Leanin:

This letter documents the short-term Upset Non-Compliance associated with the temporary wastewater treatment system currently staged at the former Plainwell Paper Mill in Plainwell, Michigan. This treatment system is in place to treat water that accumulates in a containment pad that stages floodplain soils removed from the shore of the Kalamazoo River along the Plainwell Mill property in Plainwell, Michigan.

In accordance with the Substantive Requirement Document (SRD), the temporary wastewater treatment system rented from Pro-Act Services in Ludington, Michigan, was transported to the former Plainwell Mill site prior to construction activities. The system is permitted to discharge up to 290,000 gallons per day at a flow rate up to 200 gallons per minute (gpm). Actual site operation depends upon the construction activities and the volume of water accumulated in the containment pad. Since winter weather conditions limited continuous construction activities, the system was partially dismantled between operations to avoid freezing of internal components. After early January rain events resulted in additional water accumulation within the containment pad, the system was set up for operation on January 14, 2008. The system was operated for approximately 8.5 hours over 2 days at a flow rate of 130 gpm. The flow rate was approximately 65 percent of maximum with a total treated water volume of less than 10 percent of the daily permitted amount.

RMT, Inc. (RMT) received the initial laboratory results on January 29, 2008, which indicated effluent levels of 0.99 and 0.73 ug/L total PCBs, which is over the discharge limit in the SRD. After verification of the results the next day and in accordance with the SRD, RMT contacted Ken Leanin with the MDEQ on January 30, 2008, at 2:45 p.m. to report an upset non-compliance for the wastewater treatment system. Mr. Leanin indicated that the next step is to submit written documentation of the upset compliance and a plan of action to correct operational issues and eliminate future upsets.

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Based on our discussion with ProAct, the treatment system was operated in accordance with standard practice. Back pressure on the tanks was acceptable to provide distribution of process water over the carbon bed and rule out the possibility of channeling. The carbon was unused and this was the first pass through the system so no breakthrough would be expected. The system is designed to provide up to 200 gpm. The operating flow was recorded at 130 gpm which is within the acceptable range. The carbon contact time for the process water is 18 minutes at 130 gpm which is above the target of 10 minutes. Bag filters were changed as differential pressures increased to 5 psi or above.

Visual observations indicated that the influent water was turbid with noticeable solids. The concentration of suspended solids in the effluent ranged from 5 to 7 mg/L. Breakthrough of the solids seems to be the most likely candidate for the PCB detection in the effluent.

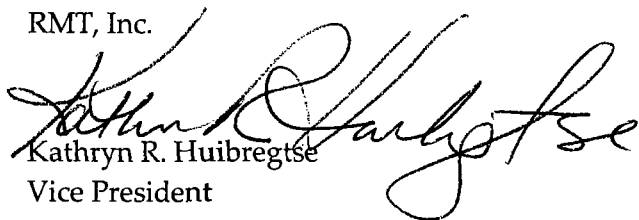
Based on these observations, the following measures are to be taken during the next event to avoid any discharge exceedance:

- Provide a post bag filter housing containing 1.0 um bag filters after the last carbon vessel but before the discharge sampling location.
- Decrease the flow rate through the system to a maximum of 100 gpm to improve the contact time on the media.
- Run the system discharge into the on-site holding tank until a verification sample analysis has been completed and reported.

If you have any questions or need additional information, please contact me at 262-879-1212.

Sincerely,

RMT, Inc.


Kathryn R. Huibregtse
Vice President

cmk

cc: Jennifer Hale, Weyerhaeuser Company
Sam Chummar, USEPA - Region 5
Paul Bucholz, MDEQ
Jim Hutchens, RMT, Inc.